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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91224150
Party	Defendant Alphafemme Coaching LLC
Correspondence Address	ALPHAFEMME COACHING LLC 3501 W 41st St Los Angeles, CA 90008-2643 hello@lifecoachlosangeles.com
Submission	Answer
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Date	11/09/2015
Attachments	Answer Opp No 91224150 AMBITIONISTA.pdf(14857 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<div>HIDAYAH NAZARUDIN, Opposer v. ALPHAFEMME COACHING LLC, Applicant.</div>	<div>Opposition No. 91224150 Serial No. 86501787 Mark: AMBITIONISTA Filing Date: January 13, 2015</div>
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ANSWER

Alphafemme Coaching LLC (“Applicant”) answers the Notice of Opposition filed by Hidayah Nazarudin (“Opposer”) against its pending Application Serial No. 86501787 as set forth below.

With respect to the ESTTA-generated filing form, Applicant admits that its mailing address of record is 3501 W 41st Street, Los Angeles, California 90008 and that it owns Application Serial No. 86501787 for the AMBITIONISTA mark shown in that application. As to the grounds for opposition, Applicant denies all such allegations and claims and denies that Opposer has been or will be damaged by the registration of Applicant's AMBITIONISTA mark. Applicant lacks sufficient information to form a belief as to the truth or falsity of the remaining allegations in the ESTTA-generated filing form, and therefore denies them.

Regarding the preamble of the Notice of Opposition, Applicant denies that Opposer has or will be damaged by the registration of Applicant's AMBITIONISTA mark, and Applicant lacks sufficient information to form a belief as to

the truth or falsity of the remaining allegations in the preamble and therefore denies them.

Regarding the numbered Paragraphs of the Notice of Opposition, Applicant answers as follows:

1. Admitted.
2. Admitted.
3. Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 3 and therefore denies them.
4. Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 4 and therefore denies them.
5. Applicant denies this request to the extent it is alleging that Opposer's purported rights in THE AMBITIONISTA mark are prior or superior to Applicant's rights in its AMBITIONISTA mark and Application Serial No. 86501787. Applicant lacks sufficient information to form a belief as to the truth or falsity of the remaining allegations in Paragraph 5 and therefore denies them.
6. Applicant admits that it has objected in writing to Opposer's use of THE AMBITIONISTA for her services, including via social media messages that may have reached Opposer's customers and/or business associates. Applicant further admits that it has sent correspondence to Opposer alleging trademark infringement and a likelihood of confusion based on Applicant's prior rights in the AMBITIONISTA mark. Applicant denies any remaining allegations and inferences in Paragraph 6.
7. Denied.
8. Denied.
9. Denied.

10. Denied.

Applicant reserves all affirmative defenses under Rule 8(c) of the Federal Rules of Civil Procedure, the Lanham Act, and any other defenses or counterclaims at law or in equity, that may now exist or in the future be available based on discovery and further factual investigation in this case.

WHEREFORE, Applicant prays that this opposition be dismissed with prejudice, and that Applicant's AMBITIONISTA mark be granted registration.

Respectfully Submitted,

Dated: November 9, 2015

ALPHAFEMME COACHING LLC

/Stephanie H. Bald/

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing ANSWER was served by First Class Mail, postage prepaid, on this 9th day of November 2015, upon counsel of Applicant at the following address of record:

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